

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

|                  |                              |
|------------------|------------------------------|
| In re:           | Bankr. Case No. 22-20823-GLT |
| U-LOCK, INC.,    |                              |
| Debtor.          | Chapter 7                    |
| CHRISTINE BIROS, |                              |
| Plaintiff,       | Adv. Pro. No.: 22-02081-GLT  |
| v.               |                              |
| SHANNI SNYDER,   |                              |
| Defendant.       |                              |

**PLAINTIFF’S REQUEST FOR ENTRY OF DEFAULT  
PURSUANT TO FED. R. BANKR. P. 7055**

TO THE CLERK OF THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA:

AND NOW comes Plaintiff, Christine Biros, by and through her undersigned counsel, Bernstein-Burkley, P.C., respectfully requests that default be entered against Defendant, Shanni Snyder pursuant to Fed. R. Bankr. P. 7055.

Federal Rule of Civil Procedure 55(a), made applicable herein by Federal Rule of Bankruptcy Procedure 7055, governs the entry of default and provides that when a party against whom a judgment for affirmative relief is sought has failed to plead or otherwise defend, and that failure is shown by affidavit or otherwise, the Clerk must enter the party’s default. Fed. R. Civ. P. 55(a). In support of Plaintiff’s request for the entry of default in its favor, please see the Affidavit attached hereto as Exhibit “A.”

In accordance with the Federal Rules of Bankruptcy Procedure, Christine Biros respectfully requests that the Clerk enter default against Defendant, Shanni Snyder.

Respectfully submitted,

Dated: January 26, 2023

BERNSTEIN-BURKLEY, P.C.

By: /s/ D. McArdle Booker

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